



1200 18TH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.WILTSHIREGRANNIS.COM

ATTORNEYS AT LAW

July 29, 2013

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 94-102, WT Docket No. 03-76

Dear Ms. Dortch:

Attached you will find a certification pursuant to Section 20.18(j)(4) of the Commission's rules regarding a request by the City of Milledgeville, Georgia, police department for Phase II E9-1-1 service.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Devine', is written over a light blue horizontal line.

Kristine Laudadio Devine
WILTSHIRE & GRANNIS, LLP
1200 18th Street, NW, Suite 1200
Washington, D.C. 20036
(202) 730-1320
jnakahata@wiltshiregrannis.com

Counsel for T-Mobile USA, Inc.

Encl.

CERTIFICATE OF SERVICE

I, Kristine Laudadio Devine, hereby certify that on this 29th day of July, 2013, I served a copy of this letter and the enclosed affidavit by overnight carrier on the following:

Allen Cowart, Communications Supervisor
Milledgeville Police Department
125 W. McIntosh Street
Milledgeville, GA 31061

A handwritten signature in black ink, appearing to read 'K. Devine', is positioned above a horizontal line.

Kristine Laudadio Devine
Counsel for T-Mobile USA, Inc.

CERTIFICATION OF Milledgeville Police Department

I, Kathleen Ham, certify:

1. This certification is made on behalf of T-Mobile USA, Inc. ("T-Mobile") under Section 20.18(j)(4) of the Commission's rules, 47 C.F.R. § 20.18(j)(4).
2. I, Kathleen Ham, am an officer of T-Mobile USA, Inc., serving as the Vice President of Federal Regulatory Affairs for T-Mobile. I am responsible for T-Mobile's compliance with FCC Regulations, including E9-1-1 requirements, have general knowledge of T-Mobile's deployment of E9-1-1 service, and have been provided the facts stated herein by T-Mobile's E9-1-1 deployment staff, which I believe to be correct. To the extent this certification discusses E9-1-1 deployment on the Public Safety Answer Point's ("PSAP") side of the demarcation point, those portions of this certification are based on T-Mobile's best understanding of those facts and circumstances, which is based largely on the representations of the PSAP and/or its Local Exchange Carrier ("LEC").
3. T-Mobile USA received a request letter for Phase II E9-1-1 service for the Milledgeville Police Department in Baldwin County, GA, on August 2, 2012. The Phase II deployment due date for the Milledgeville Police Department was set at July 10, 2013 per the Milledgeville Police Department's request, and was subsequently extended to July 28, 2013 by mutual agreement; however, required steps to complete the deployment by this date have not been completed by the PSAP. In addition, T-Mobile continues to deliver Phase II E911 services to the same area via connection to the Baldwin County PSAP.
4. To the best of my knowledge, the PSAP known as Milledgeville Police Department is currently not able to receive and utilize Phase II E9-1-1 data elements from T-Mobile USA due to the **lack of a shell record which is required to provision the ESRK range in the ALI database for routing 9-1-1**. Further implementation efforts cannot be made until the PSAP becomes ready to test the capability to receive and utilize the data elements associated with the E9-1-1 service requested from T-Mobile.
5. According to its records, T-Mobile initially contacted the Milledgeville Police Department via letter delivered by overnight courier on August 3, 2012 to obtain the necessary deployment information since the T-Mobile sites that will route Phase II service to the Milledgeville Police Department are currently routing Phase II service to the Baldwin County E9-1-1 Center. T-Mobile contacted the Milledgeville Police Department on September 7, 2012, to again request the required information to demonstrate PSAP readiness. T-Mobile discussed the deployment requirements once again with the Milledgeville Police Department on September 7, 2012. T-Mobile attempted to contact the Milledgeville Police Department via email on March 25, 2013, March 26, 2013, April 25, 2013, May 23, 2013, and June 4, 2013, requesting that the PSAP provide T-Mobile with a status on the PSAP's progress in preparing to receive E9-1-1 calls. On July 16, 2013, T-Mobile was told by Milledgeville Police Department that they were having their MSAG uploaded into Intrado, and had agreed with Baldwin County on an activation date of July 30, 2013. However, Baldwin County informed T-Mobile that they were not releasing the wireless routing to the Milledgeville Police

Department. Accordingly, to the best of T-Mobile's knowledge, the requesting PSAP (Milledgeville Police Department) has not yet provided T-Mobile with the requested information to date. T-Mobile stands ready to move forward with the remaining deployment steps once Baldwin County has agreed to release wireless routing to the Milledgeville Police Department, and once the PSAP has provided the requested information.

6. Without the shell record information, T-Mobile cannot: complete and send the data file to the ALI database provider, perform Mobile Switching Center and Gateway Mobile Location Center data translations, or test the requested service. Until the PSAP provides shell record information to T-Mobile so that T-Mobile can complete these steps, T-Mobile will not be able to transmit E9-1-1 data elements to the proper nodes within the area covered by Milledgeville Police Department's request, and the Milledgeville Police Department will therefore not be able to receive and utilize E9-1-1 data elements.
7. Listed in Attachment "A," hereto are the specific steps T-Mobile has taken to provide the requested service to the Milledgeville Police Department, and the specific steps that remain to be completed by T-Mobile. "Yes" means T-Mobile has completed that step. "Incapable" means T-Mobile cannot complete that step until the PSAP or LEC completes certain prerequisite steps, as described above. "N/A" means that the specific step is not applicable to the requested service in this instance since Phase I & II service is already in place for the six sites currently routing to the Baldwin County E-9-1-1 Center. T-Mobile has completed all necessary steps that it can complete towards E9-1-1 implementation without the PSAP providing the necessary shell record information and being ready to receive and utilize the E9-1-1 information to be provided by T-Mobile.
8. Listed in Attachment "B," hereto are the specific steps that remain to be completed by the PSAP or other parties before T-Mobile can provide the E9-1-1 service requested. "Yes" means that, to the best of T-Mobile's understanding, the PSAP has completed that step. "No" means that, to the best of T-Mobile's understanding, the PSAP or other responsible party, has not completed that step. "N/A" means that the step is not applicable to the requested service in this instance. "Unknown" means that T-Mobile does not have sufficient knowledge to make any determination regarding the status of that step.

I certify under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of July 2013, by:



Kathleen Ham, Vice President, Federal Regulatory Affairs

**ATTACHMENT A to Certification of T-Mobile USA, Inc.
with respect to the Request of the
Milledgeville Police Department (GA)
Steps taken by T-Mobile toward E9-1-1 Implementation for the
Milledgeville Police Department (GA)**

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Built, tested, and integrated the Gateway Mobile Location Center ("GMLC") into T-Mobile's network
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Built, tested, and integrated the Serving Mobile Location Center ("SMLC") into T-Mobile's network (Phase II only)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Built, tested, and integrated Location Measurement Unit(s) ("LMU") (Phase II, TDOA only)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Upgraded, tested, and patched software in Mobile Switching Center(s) ("MSC")
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Upgraded, tested, and patched software in Base Station Controller(s)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Requested selective router location (CLLI codes) from the PSAP or obtained location from an alternate source
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Sent coverage map(s) to the PSAP
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Sent data file(s) to the PSAP
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Requested routing instructions from the PSAP
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Prepared network design diagram
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Performed trunk sizing (<i>i.e.</i> , determined the number of trunks required)
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Completed forms and exhibits for ordering trunks from LEC
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Obtained PSAP authorization to order trunks, if applicable
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Ordered trunk(s) from LEC

ATTACHMENT A

**ATTACHMENT A to Certification of T-Mobile USA, Inc.
with respect to the Request of the
Milledgeville Police Department (GA)
Steps taken by T-Mobile toward E9-1-1 Implementation for the
Milledgeville Police Department (GA)**

<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Ordered transport from LEC, if applicable
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Tested trunks
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Incapable <input type="checkbox"/> N/A	Requested pANI assignment from LEC or obtained from an alternate source
<input type="checkbox"/> Yes <input type="checkbox"/> Incapable <input checked="" type="checkbox"/> N/A	Completed data file for delivery to PSAP
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Completed date file for delivery to ALI database provider
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Sent data file to ALI database provider
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Performed MSC data translation (script allowing routing of E9-1-1 voice to correct PSAP and identification of the receiving tower)
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Performed GMLC data translation (script allowing routing of E9-1-1 data to correct PSAP and identification of the receiving tower)
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Scheduled testing with PSAP
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Performed profile test
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Performed field test
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Reconciled field test
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Performed retest, if applicable
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Incapable <input type="checkbox"/> N/A	Accepted testing (provisioning complete)

ATTACHMENT A

**ATTACHMENT B to Certification of T-Mobile USA, Inc.
with respect to the Request of the
Milledgeville Police Department (GA)
Actions Required By the PSAP or Other Parties
Before T-Mobile Can Complete E9-1-1 Implementation**

<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Requested service from LEC (PSAP)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Unknown	Sent selective router location (CLLI codes) to T-Mobile (PSAP)
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Unknown	Sent routing instructions to T-Mobile (PSAP)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Upgraded Customer Premises Equipment ("CPE") (including Computer Aided Dispatch ("CAD"), Geographic Information System ("GIS"), and 10-digit capability) (PSAP)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Built Master Street Address Guide ("MSAG") (PSAP)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Completed data file upload (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Upgraded ALI database, if applicable (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Upgraded selective router, if applicable (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Provisioned trunks for T-Mobile (LEC)
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Unknown	Provisioned or upgraded trunks for PSAP (from Phase zero to Phase I or II), if applicable (LEC)